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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
v.
DENIS GUTSU (#1),
Defendant.

Case No.: 2:23-CR-272-DAD-1

EX PARTE APPLICATION TO
MODIFY CONDITIONS OF
RELEASE FOR DEFENDANT
DENIS GUTSU TO ALLOW
TRAVEL FROM NOVEMBER 5,
2023 TO NOVEMBER 21, 2023

Defendant Denis Gutsu hereby applies, by and through his counsel Shaun Khojayan, that his conditions of release be modified to allow defendant Denis Gutsu to travel with his family on a pre-paid cruise (purchased before his indictment) from November 5-21, 2023 leaving from San Francisco to Hawaii with a stop in Ensenada, Mexico. Defendant Denis Gutsu has and will continue to inform his assigned pretrial officer Stephanie Mott of his itinerary. Pretrial services will need to return Denis Gutsu's passport to him for this trip and Mr. Gutsu will contact officer Mott upon his return to Sacramento and surrender his passport back to pretrial services on November 22, 2023 upon his return.

Pretrial services takes no position on this request and reports no compliance issues with Denis Gutsu.

The defense emailed and left a message for AUSA Fogg to get his position on this request but no response was received by the time of this filing.

All other conditions previously imposed, not in conflict, would remain in full force and effect.

Respectfully submitted,

Dated: October 31, 2023

s/ Shaun Khojayan

Attorney for Denis Gutsu

I agree with the proposed modification of conditions described above.

Dated: October 31, 2023

s/ Denis Gutsu

ORDER

This Ex Parte Application to modify conditions of release for defendant Denis Gutsu is hereby approved and so ORDERED.

Dated: November 1, 2023

Carol A. Delaney

CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE